

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON WAVE 4 CASES LISTED IN  
EXHIBIT A OF PLAINTIFFS' NOTICE OF  
ADOPTION

JOSEPH R. GOODWIN U.S. DISTRICT  
JUDGE

**REPLY TO NOTICE OF ADOPTION OF PRIOR DAUBERT RESPONSE  
OF THOMAS C. WRIGHT JR., M.D. FOR WAVE 4**

In a short paragraph at end of its “Notice of Adoption,” Ethicon adds the additional argument that Plaintiffs’ Wave 4 adoption of their Wave 1 briefing provides “no challenge to [Dr. Wright’s] opinions specific to TVT.” Def.’s Br. at 1. Ethicon does not even attempt to explain, however, how the opinions challenged through Plaintiffs’ Wave 1 briefing would not also apply to Dr. Wright’s TVT opinions in Wave 4—or any other Wave for that matter. In Wave 1, Plaintiffs’ challenged Dr. Wright’s opinions with regard to: the causes of Pelvic Organ Prolapse (POP) *and Stress Urinary Incontinence* (SUI); the treatment options for *both* these conditions; and the outcomes of those treatment options (including “success rates”). The basis of Plaintiffs’ challenge to these POP and SUI opinions was simple: he has no clinical experience treating POP or SUI. See Dkt. No. 1988. And in its Wave 1 Order, this Court addressed Plaintiffs’ arguments with regard to Dr. Wright’s opinions on both POP and SUI. Dkt. No. 2661 at 6. Therefore, because Ethicon’s TVT is used to treat SUI, Ethicon is simply wrong that Plaintiffs’ Wave 1 arguments do not apply equally to Wave 4 cases involving the TVT.

Plaintiffs respectfully request that the Court grant Plaintiffs' motion to exclude the opinions of Thomas C. Wright Jr. M.D., for the reasons expressed in the adopted Wave 1 Memorandum (Dkt. No. 1988) and this Wave 4 Reply.

Dated: May 4, 2017

Respectfully submitted,

/s/ Edward A. Wallace

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 4, 2017, I electronically filed the foregoing document with the Clerk of the court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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